

25-CV-1042  
SCC

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

PRISONER CIVIL RIGHTS COMPLAINT  
42 U.S.C. § 1983

DEMANDA POR VIOLACION A DERECHOS CIVILES DE CONFINADO  
42 U.S.C. § 1983

RECEIVED AND FILED  
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2025 JAN 23 PM4:36

Mr. DAUNTA LESHTA HEAD

Full name of plaintiff

Nombre completo del demandante

v.

Dr. Luis NAZARIO GUÍRAY M.D.

AGENT DEL TORO

Full name(s) of defendant(s)

nombre completo de(l)/los demandado(s)

I. Previous lawsuits.  
*Pleitos radicados anteriormente.*

A. Have you brought other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

*¿Ha iniciado usted otros pleitos en los tribunales estatales o federales que tengan que ver con los mismos hechos de la presente acción o que se relacionen con su reclusión?*



Yes (Sí)

( ) No

B. If your answer to "A" is yes, describe the lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.

*Si la contestación a la pregunta "A" es en la afirmativa, describa el pleito en el espacio siguiente. De existir más de un pleito, descríbalos en otro papel*

*utilizando el mismo modelo.*

1. Parties to the previous lawsuit.  
*Partes en el pleito anterior.*

Plaintiff(s)

Demandante(s)

DAUNTA HEAD

Defendant(s)

Demandado(s)

MARTINEZ ET AL

2. Court. If federal court, name the district, if state court, name the county or part.

*Tribunal. Si es un tribunal federal, indique el distrito, si es un tribunal estatal, indique el condado o sala.*

UNITED STATES DISTRICT COURT

ROOM 150 FEDERAL BUILDING

SAN JUAN, PUERTO RICO 00918-1767

3. Docket number.

*Número asignado.* 3:24-CV-01576-MAJ

4. Name of judge to whom the case is assigned.

*Nombre del juez a quien se le asignó el caso.*

HONORABLE MARÍA ANTONIÓRGÍ-JORDAN

5. Disposition. For example: Was the case dismissed? Was it appealed? Is it still pending?

*Disposición. Por ejemplo: ¿Se desestimó el caso? ¿Se apeló? ¿Se encuentra aún pendiente?*

STILL PENDING

6. Approximate date of filing lawsuit.

*Fecha aproximada en que radicó el pleito.*

DECEMBER 9, 2024

7. Approximate date of disposition.  
*Fecha aproximada en que se resolvió el pleito.*

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II. Place of confinement.  
*Lugar actual de reclusión.*

BAYAMON 501 CORRECTIONAL FACILITY  
BAYAMON, PUERTO RICO 00961-7403

A. Is there a prisoner's grievance procedure in the institution?  
*¿Existe un procedimiento de quejas y agravios para los confinados en la institución?*

Yes (Sí)       No

B. Did you present the facts related to your complaint in the state prisoner's grievance procedure?  
*¿Presentó usted los hechos de su querella bajo el procedimiento de quejas y agravios para confinados?*

Yes (Sí)       No

C. If your answer is yes,  
*Si su contestación es afirmativa,*

1. What steps did you take?  
*¿Qué medidas tomó usted?*

I WROTE GRIEVANCES OVER A (4) MONTH PERIOD,

HAD MULTIPLE CONVERSATIONS WITH DIFFERENT PRISON  
OFFICIALS AND WROTE TO SENATOR JOANNE M. RODRIGUEZ VENE.  
2. What was the result? Also, OFICINA DEL PROCURADOR DE CIUDADANO.  
*¿Cuál fue el resultado?*

THE GRIEVANCE PROCESS BECAME INEFFECTIVE DUE TO LANGUAGE  
BARRIER AND ALL CORRESPONDANCE FOR ASSISTANCE WAS JUST  
REFERRED BACK TO DEPARTMENT OF CORRECTIONS.

D. If your answer is No, explain why not!  
*Si su contestación es No, explique porqué.*

I ONLY SPEAK ENGLISH AND MOST OF  
INFORMATION/PROCEDURES ARE IN SPANISH.

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities?

*Si no existe un procedimiento de quejas y agravios en la institución, ¿se quejó usted con las autoridades de la institución?*

() Yes (Sí)      ( ) No

F. If your answer is Yes,

*Si su contestación es en la afirmativa,*

1. What steps did you take?

*¿Qué medidas tomó usted?*

WHEN POSSIBLE I SPOKE TO BI-LINGUAL OFFICIALS EXPLAINING MY ISSUES.

2. What was the result?

*¿Cuál fue el resultado?*

INDIFFERENCE AND VERY LONG TIMES BEFORE GIVEN A RESPONSE. IF A RESPONSE WAS GIVEN AT ALL.

III. Parties.

Partes.

In item A below, write your name in the first blank and write your present address in the second blank. Do the same for additional parties, if any, using the reverse side if necessary.

*Bajo la letra A, escriba su nombre en la primera línea y su dirección actual en la segunda línea. Si hay demandantes adicionales, provea la misma información utilizando el dorso si es necesario.*

A. Name of plaintiff

*Nombre del demandante*

Mr. DAUNTA HEAD

Address

*Dirección*

BAJAMON 501

EDIF 2F-10B

50 CARR5

INDUSTRIAL LUCHETTI

BAJAMON, PUERTO RICO 00961-7403

In item B below, write the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use item C for the name, position and place of employment of any additional defendant.

*Bajo la letra B, escriba en la primera línea el nombre completo del demandado, en la segunda línea escriba el puesto que ocupa y en la tercera línea escriba el lugar donde está empleado. Utilice el apartado C para escribir el nombre, puesto y lugar de empleo de otro demandado.*

B. Defendant  
Demandado

Dr. LUIS NAZARIO-GUIRAN M.D.

is employed as  
está empleado como

EMERGENCY Room physician

at  
en

CENTRAL MEDICAL CENTER  
BAYAMON CORRECTIONAL FACILITY

IV. Statement of Claim.  
*Relación de Hechos.*

State here, as briefly as possible, the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates or statutes. Do not give any legal arguments or cite any cases or statutes. If you intend to alledged a number of related claims, number and set forth each claim in a separate paragraph. Attach an extra sheet if necessary.

*Escriba brevemente los hechos del caso. Describa la participación de cada uno de los demandados. Incluya también los nombres de otras personas que tuvieron participación, las fechas y los estatutos. No presente argumentos legales ni cite precedentes ni estatutos. Si usted quiere presentar varias reclamaciones, enumérelas y hágalo en párrafos por separado. Puede utilizar otra hoja de papel si lo considera necesario.*

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SEE ATTACHED DOCUMENTS

(4) PAGES ENCLOSED

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*Bajo la letra B, escriba en la primera línea el nombre completo del demandado, en la segunda línea escriba el puesto que ocupa y en la tercera línea escriba el lugar donde está empleado. Utilice el apartado C para escribir el nombre, puesto y lugar de empleo de otro demandado.*

B. Defendant  
Demandado

AGENT DEL TORO

is employed as  
está empleado como

LIAISON POLICE OFFICER

at  
en

BAYAMON 5DI CORRECTIONAL FACILITY  
BAYAMON, PUERTO RICO 00961-7403

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SEE ATTACHED DOCUMENTS

(9) PAGES ENCLOSED

## STATEMENT OF CLAIM

MY NAME IS, MR. DAUNTA HEAD, AND I AM A FORMER FEDERAL EMPLOYEE AT THE JESSE BROWN V.A. MEDICAL CENTER IN CHICAGO, ILLINOIS. I AM ALSO AN HONORABLY DISCHARGED ARMY VETERAN OF THE PERSIAN GULF WAR ERA. I AM CURRENTLY INCARCERATED FOR CHARGES I INCURRED WHILE ON VACATION IN PUERTO RICO. MOST IMPORTANTLY IS THE FACT THAT I DO NOT SPEAK SPANISH. THE LANGUAGE BARRIER AMONG OTHER PRISON ISSUES HAVE MADE MY SENTENCE OVERWHELMING AND INHIBITED MY RIGHTS TO FAIR AND EQUAL TREATMENT UNDER THE LAW.

ON JUNE 24, 2024 AT THE BAYAMON CORRECTIONAL FACILITY 501 ON HOUSING UNIT # 2F, I WAS ATTACKED BY (5) FELLOW INMATES FOR ATTEMPTING TO WATCH NEWS IN THE "ENGLISH" LANGUAGE. THIS OCCURRED AT EXACTLY 8AM, DESPITE THE FACT IT WAS DURING THE DESIGNATED "ENGLISH" LANGUAGE HOURS OF 6:30AM TO 8:30AM. THESE ATTACKERS HAD BEEN DISCRIMINATING AND TARGETING ME FOR BEING A NON SPANISH SPEAKING AFRICAN-AMERICAN. THEY WOULD MAKE DISPARAGING STATEMENTS, PERFORM ACTIONS MEANT TO INTIMIDATE AND INFRINGE UPON MY SIMPLE PRIVILEGES LIKE; SHOWER TIME, USAGE OF THE MICRO-WAVES AND THE "ENGLISH" NEWS TIME PERIOD.

This CLAIM IS AGAINST DR. LUIS A. NAZARIO GUIRAN M.D. AT THE CMC MEDICAL FACILITY AND STAFF, WHO NOT ONLY FAILED TO PROPERLY EXAMINE AND TREAT MY INJURIES RELATED TO BEING ATTACKED BUT WHO MADE DEROGATORY AND VERBALLY ABUSIVE STATEMENTS CALLING ME AN ACTIVE DRUG ADDICT TELLING ME THAT I WOULD USE DRUGS TIL MY DEATH. ALSO, FOR ON-GOING UNDIAGNOSED AND POORLY TREATED SYMPTOMS / ISSUES RELATED TO THE

(2)

## ATTACK UPON ME.

This claim is also against Agent Del Toro of the Bayamon Police Department, who works as the liaison officer at Bayamon 501 Correctional Facility, for failing to press criminal charges upon my attackers despite repeated requests verbally and written. Agent Del Toro failed to interview me and take my victim statement for (2) days after my attack, leaving some of my attackers to stay on the same housing unit as me to further abuse and intimidate me. At this time, I am still unsure of the consequence issued to my assailants.

On June 24, 2024 at 7am, I observed that one of the two televisions on Housing Unit #2F at Bayamon 501 was not on an "English" language station. It was determined that "English" news would be shown on one of the two televisions between the hours of 6:30AM to 8:30AM. A sign was also posted below the TV. As the only non-Spanish speaking prisoner, I wanted to change to "English" news but was aware that other prisoners didn't care about my inability to speak Spanish or my want to watch "English" news. I decided to wait until their program ended at 8AM, thought it was already the designated "English" hours.

At 8AM, when I attempted to change the channel to "English" news I was told not to do it by other inmates. These (5) prisoners began arguing with me in a broken English/Spanish mix of words. The inmates were Andre De Valle, Jonathan Vega, Rafael Vargas, Luis Nazario (same name as Doctor coincidentally) and Daniel Gonzalez.

JONATHAN VEGA HIT ME IN THE HEAD WITH A CANE GIVEN TO HIM BY HIS CELL-MATE LUIS NAZARIO FROM THE BACK, AS I ARGUED WITH ANDRE DE VALE AND DANIEL GONZALEZ. AS I TURNED TO FACE JONATHAN VEGA, RAFAEL VARGAS THEN BLIND-SIDED ME WITH A MOP WRINGER AND HIT ME IN THE HEAD. ALL THE OTHER VARIOUS ACTIVITY AROUND ME BECAME A BLUR UNTIL THE CORRECTIONAL OFFICERS LOCKED EVERYONE IN THEIR CELLS.

I WAS IMMEDIATELY TAKEN TO CMC MEDICAL CENTER FOR MY INJURIES WITHOUT BEING QUESTIONED OR GIVEN AN OPPORTUNITY TO MAKE A STATEMENT. THIS WAS DONE BECAUSE NONE OF THE OFFICERS OR THE SUPERINTENDANT PRESENT SPOKE ENGLISH.

UPON MY ARRIVAL AT CMC MEDICAL CENTER I WAS TRIAGED BY NURSE "NORMA DAVILA", WHO NOTED MY HEAD INJURIES AND MY BLOOD PRESSURE OF APPROXIMATELY 197/123. SHE REFERRED ME TO DR. LUIS NAZARIO GUIRAY M.D. WHO IMMEDIATELY ACCUSED ME OF BEING AN ACTIVE DRUG USER AS THE REASON FOR MY HIGH BLOOD PRESSURE. I TOLD HIM I HAD NOT USED DRUGS THROUGH-OUT MY INCARCERATION AND HE RESPONDED BY TELLING ME I WOULD RELAPSE UPON MY RELEASE THEN DIE IN MY ADDICTION BY A FENTENAL OVERDOSE. HE KEPT ME OVER-NIGHT FOR MY BLOOD PRESSURE BUT NEVER EXAMINED MY HEAD INJURIES THOUGH I INFORMED HIM I HAD BEEN STRUCK TWICE IN THE HEAD IN AN ATTACK. I HAVE BEEN HAVING CONSTANT HEADACHES, BLURRY VISION, BALANCE ISSUES, MEMORY ISSUES AND LOUDER TINNITUS IN MY EARS. I REQUESTED AN M.R.I. TEST BUT RECEIVED NO RESPONSE. I HAVE ONLY BEEN GIVEN IBUPROFEN FOR MONTHS FOR MY ON-GOING SYMPTOMS / ISSUES.

I HAVE TRIED TO USE THE GRIEVANCE PROCEDURES BUT ONLY RECEIVED A RESPONSE STATING THE INCIDENT WOULD BE INVESTIGATED AND THAT A FUTURE APPOINTMENT WOULD BE MADE TO EXAM MY SYMPTOMS. IT HAS BEEN MONTHS AND NEITHER OF THESE THINGS HAVE COME TO PASS. I DO NOT FULLY UNDERSTAND MANY RESPONSES TO THE GRIEVANCES BECAUSE I HAVE TO RELY ON A SMALL SPANISH/ENGLISH DICTIONARY AND/OR OTHER INMATES INTERPRETATIONS. I HAVE WRITTEN AT LEAST (3) GRIEVANCES ABOUT THIS MATTER AND DISCUSSED MY MEDICAL ISSUES REPEATEDLY ON SICK CALL WITHOUT ANY OF THESE MATTERS ADDRESSED IN A PROPER WAY TO PROVIDE A RESOLUTION.

My Dispute with the Bayamon Police Liason Officer known as "AGENT DEI TORO" STEMS FROM HIS FAILURE TO INTERVIEW ME FOR A VICTIM STATEMENT FOR (21) DAYS AFTER THE ATTACK UPON ME ALLOWING (3) OF MY (5) ATTACKERS TO STAY UPON MY HOUSING UNIT TO FURTHER DEGRADE, INTIMIDATE AND VERBALLY ABUSE ME. INCLUDING "RAFAEL VARGAS", WHO WAS ONE OF MY MAIN ATTACKERS. RAFAEL VARGAS BLIND-SIDED ME WITH THE MOP WRINGER HITTING ME IN THE HEAD.

I HAD FAMILY MEMBERS AND FRIENDS CALLING THE PRISON AND BAYAMON POLICE STATION TO FILE CRIMINAL CHARGES, I WROTE VARIOUS GRIEVANCES ABOUT THE ATTACK AND MY ATTACKERS STILL BEING ON HOUSING UNIT 2F WITH ME, AND DISCUSSED DRESSING CHARGES WITH VARIOUS PRISON OFFICIALS. MY SOCIAL WORKER "ANGEL GARCIA", MY PSYCHOLOGIST "DR. JULIMAR CABEL-COLON" AND SEVERAL LIEUTENANTS WHO ARE ALL BI-LINGUAL. I TRIED FOR MONTHS BUT NO ONE ALLOW ME TO DRESS CHARGES. ON THE 29TH OF AUGUST 2024, I MET WITH "AGENT DEI TORO" BY THE DIRECTIVE GIVEN BY THE PRISON SUPERINTENDANT "VICTOR MAIDENADO VAZQUEZ"

TO DISCUSS THE JUDICIAL PROCESS OF PRESSING CHARGES.  
I TOLD HIM "AGENT DEL TORO" REPEATEDLY THAT I WANTED  
TO PRESS CRIMINAL CHARGES. WE CONVERSED THROUGH  
A TRANSLATION APP AND THIS IS WHY I REPEATED  
MY INTENTIONS. STILL TO THIS DAY NONE OF MY (5)  
ATTACKERS HAVE BEEN HELD CRIMINALLY LIABLE FOR THEIR  
ACTIONS.

JUNE 24, 2024 AT BAM - ATTACK

(RAFAEL VARGAS, JONATHAN VEGA, ANDRE DE VALE, DANIEL GONZALEZ - RODRIGUES AND LUIS NAZARIO)

AFTER (2) BLOWS TO MY HEAD, TAKEN TO CMC MEDICAL CENTER.

OVER-NIGHT STAY TO MONITOR BLOOD PRESSURE OF  $\frac{197}{123}$ .

NO EXAMINATION OF HEAD INJURIES

JUNE 25, 2024

RETURNED TO UNIT 2F TO FIND ONLY (2) OF ASSAILANTS MOVED  
JONATHAN VEGA AND ANDRE DE VALE. SICK CALL FOR HEADACHES.

JUNE 26, 2024

TALKED TO FAMILY ABOUT ATTACK AND DESIRE TO PRESS  
CHARGES.

JUNE 27, 2024

FAMILY AND FRIENDS TOLD ME THAT THE BAYAMON POLICE DEPT.  
KEPT HANGING UP ON THEM BECAUSE OF LANGUAGE BARRIER.

JUNE 28, 2024

WRITING GRIEVANCE # B-951-24, ABOUT DR. LUIS NAZARIO GUIRAY,  
NOT EXAMINING PROPERLY AND DEROGATORY LANGUAGE. ALSO,  
ON-GOING SYMPTOMS FROM ATTACK.

WRITING GRIEVANCE # B-950-24, ABOUT "RAFAEL VARGAS" STILL  
BEING ON SAME HOUSING UNIT TRYING TO INTIMIDATE ME.

July 1, 2024

I WENT TO PSYCHOLOGIST "JULIMAR CAEZ-COLON" TO DISCUSS THE ATTACK, INTIMIDATION TACTICS OF "RAFAEL VARGAS" AND DIFFICULTY OF FAMILY TO PRESS CHARGES.

WROTE GRIEVANCE # B-1006-24, ABOUT "RAFAEL VARGAS" STILL BEING ON UNIT 2F AND DESIRE TO PRESS CHARGES.

July 2, 2024, NO SICK CALL SERVICES

July 3, 2024, TAKEN TO MEDICAL FOR DIZZINESS & HEADACHES. SPOKE TO LT. CHRISTIAN ABOUT RACISM AND INTIMIDATION AND HE SPOKE TO ENTIRE 2F-UNIT ABOUT IT BEING BAD ACTIONS.

July 9, 2024, DISCUSSED ATTACK WITH SOCIAL WORKER "ANGEL GARCIA" AND WROTE STATEMENT TO PRESS CHARGES.

JULY 10, 2024, "LT. LOUBRIEL" TALKED TO ME WITH "OFFICER FRANK" INTERPRETING ABOUT ATTACK AND TOLD ME THAT I COULD MOVE TO ANOTHER HOUSING UNIT BUT I DENIED THAT OFFER BECAUSE IT FELT LIKE A PUNISHMENT. HE TOLD ME THAT "RAFAEL VARGAS" COULD NOT BE MOVED BECAUSE I HAD WRITTEN NO STATEMENT ON HIM THE DAY OF THE ATTACK. ALTHOUGH "JONATHAN VEGA" AND "ANDRE DE VALLE" WERE MOVED THAT DAY WITHOUT A STATEMENT. HE ALSO CAME TO UNIT 2F AND THREATENED TO TAKE BOTH T.V.'S IF WE COULD NOT ALLOW ME ACCESS TO "ENGLISH" NEWS.

MEDICATIONS REFILLS FOR HEADACHES ONLY

JULY 15, 2024, SPOKE WITH "LT. HUERTAS" ABOUT "AGENT DEL TORO" NOT TAKING MY STATEMENT ABOUT FIGHT AS A VICTIM AND "RAFAEL VARGAS" STILL BE ON UNIT 2F WITH ME. SHE STATED THAT SHE HAD NO IDEA BUT WOULD CHECK WITH HIM AND HAVE HIM DO IT.

ALSO, SPOKE AGAIN WITH PSYCHOLOGIST "JULIMAR CAEZ-COLON" TO GET TECHNIQUES AND ENCOURAGEMENT TO WITHSTAND NEGATIVE PROVOKING BEHAVIORS OF "RAFAEL VARGAS".

July 18, 2024, FINALLY SPOKE TO "AGENT DEL TORO" AND WROTE 2ND STATEMENT AS VICTIM. "RAFAEL VARGAS" WAS IMMEDIATELY MOVED. "AGENT DEL TORO" TOLD ME THAT HE WOULD CALL ME WITH A STATUS OF CASE SOON.

July 24, 2024, WROTE GRIEVANCE # B-1073-24 ABOUT ON-GOING SYMPTOMS AND REQUESTED AN M.R.I. EXAM.

July 27, 2024, WROTE GRIEVANCE # B-1072-24 REQUESTING AN UPDATE ON THE PROCESS OF FILING CHARGES AGAINST MY ATTACKERS.

July 29, 2024, GIVEN MORE IBUPHROFEN FOR HEADACHES AND OTHER SYMPTOMS.

DISCUSSED HOW TO RELIEVE PERSISTENT STRESS RELATED TO ATTACK AND MEDICATION SITUATIONS. THE PSYCHOLOGIST DR. JULIMAR CAEZ-COLON ASSISTED ME WITH THESE TECHNIQUES TO RELIEVE STRESS.

■ AUGUST 15, 2024, SICK CALL ABOUT HEADACHES AND REQUESTED BLOOD PRESSURE SCREENING / MONITORING TO SEE IF MY HEADACHES WERE RELATED TO HYPERTENSION.

AUGUST 29, 2024, CONVERSATION WITH "AGENT DEL TORO" DIRECTED BY SUPERINTENDANT "VICTOR MARDONADO VAZQUEZ" TO PROCEED WITH PRESSING CRIMINAL CHARGES ON MY ATTACKERS. "AGENT DEL TORO" USED A TRANSLATION APP BUT I REPEATEDLY TOLD HIM I WANTED TO PROCEED WITH PRESSING CHARGES.

RECEIVED RESPONSE FOR GRIEVANCE # B-951-24 STATING THAT CMC HAD NO RECORD OF MY COMPLAINT TO MEDICAL CENTER WITH "HEAD INJURIES." FROM DR. JOSE RODRIGUEZ GALARZA.

SEPTEMBER 3, 2024, MEDICATION REFILL FOR HEADACHES.

SEPTEMBER 16, 2024, MEDICATION REFILL FOR HEADACHES.

SEPTEMBER 23, 2024, MEDICATION REFILL FOR HEADACHES.

OCTOBER 9, 2024; LETTER FROM "OFICINA DEL PROCURADOR DEI CIUDADANO" (OMBUDSMAN) STATING THAT THEY HAVE REFERRED MY CASE ABOUT THE ATTACK TO THE DEPARTMENT OF CORRECTIONS FOR CONSIDERATION AND RELIEF.

OCTOBER 15, 2024 - MEDICATION REFILL FOR HEADACHES.

NOVEMBER 4, 2024 - WROTE GRIEVANCE # B-1576-24 REQUESTING STATUS OR RESULTS OF GRIEVANCE # B-951-24. (DR. NAZARIO-GUIRAY)  
DENIED

WROTE GRIEVANCE # B-1571-24 REQUESTING STATUS OF THE GRIEVANCE # B-1072-24. (ABOUT PRESSING CHARGES ON ATTACKERS)  
DENIED

WROTE GRIEVANCE # B-1574-24 REQUESTING COPY OF GRIEVANCE B-950-24 AND RESPONSE. DENIED

WRDTE GRIEVANCE # B-1577-24 - REQUESTING INFORMATION ABOUT WHY MY GRIEVANCE # B-1006-24 WAS DENIED WHEN THE DATES WERE CORRECT. DENIED

NOVEMBER 12, 2024 - RECEIVED RESPONSE TO GRIEVANCE # B-1073-24 FROM DR. JOSE RODRIGUEZ GALARZA STATING DR. LUIS NAZARIO GUIRAY M.D. WOULD BE INTERVIEWED ABOUT MY COMPLAINT AND THAT AN

APPOINTMENT WOULD BE MADE TO ADDRESS MY ON-GOING ISSUES DERIVED FROM THE ATTACK ON ME.

NOVEMBER 19, 2024 - LETTER FROM SENATOR JOANNE RODRIGUEZ VENEG STATING THAT SHE WOULD REFER MY ISSUES CAUSED BY LANGUAGE BARRIER TO THE DEPARTMENT OF CORRECTIONS.

THIS IS THE OCCURANCES, EVENTS AND ACTIONS TAKEN SURROUNDING THE ATTACK UPON ME FOR TRYING TO WATCH NEWS IN "ENGLISH".

I FEEL THAT THE ACTIONS AND NON-ACTIONS OF DR. LUIS NAZARIO GUILAY M.D. WERE NOT ONLY PURPOSEFULLY DEGRADING VERBALLY BUT ALSO CRIMINALLY NEGIGENT BECAUSE OF MY ON-GOING MEDICAL ISSUES FROM THE ATTACK.

I FEEL THAT THE ACTIONS AND NON-ACTIONS OF "AGENT DEL TORO" WERE GROSSLY NEGIGENT AND DISPLAY A HIGH LEVEL OF DEPRAVED INDIFFERENCE. HE HAS DENIED ME THE EXERCISING OF MY CONSTITUTIONAL RIGHTS AND PUT THE MESSAGE OUT IN THE PRISON COMMUNITY THAT THERE ARE NO REPERCUSSIONS FOR ATTACKING ME.

I FEEL HELPLESS AND AM REQUESTING ASSISTANCE TO ENSURE THESE EVENTS DON'T HAPPEN TO ANOTHER NON-SPANISH SPEAKING PRISONER OR ANY OTHER PRISONER. I AM ASKING FOR HELP TO SEEK JUSTICE FOR MYSELF, WHILE I AM GIVING YEARS OF MY LIFE AS JUSTICE FOR OTHERS.

THANK YOU

- Duffel

V. Request for Relief.  
*Solicitud de Remedio.*

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

*Indique brevemente lo que usted espera que el tribunal haga por usted. No escriba argumentos legales ni cite precedentes ni estatutos.*

I WANT COMPLETE DIAGNOSIS AND TREATMENT FOR MY ON-GOING PHYSICAL ISSUES, TO KNOW RESULTS OF INTERVIEW AND INTERVENTIONS WITH DR. LUIS NAZARIO-GUIRAN M.D. A MORE EFFECTIVE AND TRANSPARENT GRIEVANCE PROCESS IN "ENGLISH" AS WELL AS SPANISH. OBLIGATION FOR MEDICAL STAFF TO PERFORM "COMPLETE" EXAMINATION, ANNOTATE RESULTS, AND EXPLAINING OF PROPOSED TREATMENT PLAN.

(CONTINUED ON REVERSE SIDE) →

I declare under penalty of perjury that the foregoing is true and correct.  
*Declaro bajo pena de perjurio que lo anterior es cierto y correcto.*

Signed this 12 day of JANUARY of 2025.  
(día) (mes) (año)



Plaintiff's signature  
Firma del demandante

I WANT A REGULATED THAT STATES VICTIM STATEMENTS FROM INMATES OF VIOLENT CRIMES MUST BE TAKEN WITHIN A REASONABLE TIME PERIOD, THAT A SYSTEM IS PUT IN PLACE TO DISCERN BETWEEN "REGULAR" GRIEVANCES AND "EMERGENCY" GRIEVANCES TO REQUIRE A RAPID RESPONSE AND "EMERGENCY ACTIONS" IN CASES DEEMED NECESSARY. I WANT THE SYSTEM TO BE MORE ACCOMMODATING TO NON-SPANISH SPEAKING INMATES TO ENSURE THEIR EQUAL RIGHTS AND TREATMENT. I WANT ANY AND ALL PUNITIVE DAMAGES, VIOLATIONS OF MY CONSTITUTIONAL RIGHTS, DAMAGES FOR PAIN AND SUFFERING, AND OTHER FINANCIAL MANNERS OF COMPENSATION THE COURT MAY FIND APPROPRIATE FOR THESE MATTERS.